

ORIGINAL

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6 **ASSOCIATION OF WOMEN WITH DISABILITIES**
ADVOCATING ACCESS and DELORES JACKSON

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11 Attorneys For Defendant
HEALTHCARE UNIFORM COMPANY, INC.

12
13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

BY FAX

15 **ASSOCIATION OF WOMEN WITH**
16 **DISABILITIES ADVOCATING ACCESS,**
17 **SUING ON BEHALF OF DELORES**
18 **JACKSON AND ITS MEMBERS; and**
19 **DELORES JACKSON, An Individual,**

Plaintiff,

v.

20 **450 FLETCHER PARKWAY PLAZA, et**
21 **al.,**
22 **Defendants.**

Case No. 06 CV 1832 WMc

STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR RESPONSIVE PLEADING

FILED

2006 OCT 17 AM 8:29

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY AM DEPUTY

RECITALS

The parties agree that the following facts, among others, provide some background for their entry into this Stipulation:

A. Plaintiffs' Association of Women With Disabilities Advocating Access, suing on behalf of Delores Jackson and its members, and Delores Jackson (collectively, "Plaintiffs") filed their complaint against, among others, defendant Healthcare Uniform Company, Inc. ("Defendant") on September 11, 2006.

B. Although service of the summons and complaint on Defendant was likely effected on or around September 20, 2006, there is currently some uncertainty as to the exact date when service of process on Defendant was effected.

C. An extension until October 17, 2006 for Defendant to file and serve a responsive pleading will allow the parties to set a date certain for Defendant's responsive pleading and avoid any dispute regarding service of the summons and complaint.

D. Additionally, an extension until October 17, 2006 for Defendant to file and serve a responsive pleading will provide the parties with an opportunity to better determine their respective positions in this matter and further determine if the dispute may be resolved amicably.

STIPULATION

NOW, THEREFORE, on the basis of the facts set forth in the Recitals above, the parties hereby agree as follows:

1. In an effort to allow the parties an opportunity to better determine their respective positions in this matter and to provide a date certain for Defendant's response to the complaint, the parties agree that Defendant will have until and through October 17, 2006, to file and serve a responsive pleading.

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602869

1 2. The parties respectfully request that the Court approve this stipulation.

2 Dated: October 11, 2006

PINNOCK & WAKEFIELD
Theodore A. Pinnock
David C. Wakefield
Michelle L. Wakefield

5 By: _____

Theodore A. Pinnock
Attorneys for Plaintiffs
ASSOCIATION OF WOMEN WITH
DISABILITIES ADVOCATING ACCESS
and DELORES JACKSON

10 Dated: October __, 2006

BRYAN CAVE LLP
Amy M. Gantvoort

12 By: _____

Amy M. Gantvoort
Attorneys for Defendant
Healthcare Uniform Company, Inc.

16 **[PROPOSED] ORDER**

17 Good cause appearing herein, the stipulation is approved. IT IS SO ORDERED.

19 Dated: October __, 2006

HON. MARILYN L. HUFF

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SANTA MONICA, CALIFORNIA 90401-2386

2. The parties respectfully request that the Court approve this stipulation.

Dated: October __, 2006

PINNOCK & WAKEFIELD
Theodore A. Pinnock
David C. Wakefield
Michelle L. Wakefield

By: _____

Theodore A. Pinnock
Attorneys for Plaintiffs
ASSOCIATION OF WOMEN WITH
DISABILITIES ADVOCATING ACCESS
and DELORES JACKSON

Dated: October 12, 2006

BRYAN CAVE LLP
Amy M. Gantvoort

By: _____

Amy M. Gantvoort
Attorneys for Defendant
Healthcare Uniform Company, Inc.

[PROPOSED] ORDER

Good cause appearing herein, the stipulation is approved. IT IS SO ORDERED.

Dated: October 13, 2006

Marilyn L. Huff
HON. MARILYN L. HUFF

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 120 Broadway, Suite 300, Santa Monica, California 90401.

On October 12, 2006, I served the foregoing document, described as **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR RESPONSIVE PLEADING**, on each interested party in this action, as follows:

Theodore A. Pinnock, Esq.
David C. Wakefield, Esq.
Michelle L. Wakefield, Esq.
3033 Fifth Avenue, Suite 410
San Diego, California 92103
Telephone: (619) 858-3671
Facsimile: (619) 858-3646

Attorneys for Plaintiffs

☒ (BY MAIL) I placed a true copy (or original) of the foregoing document in a sealed envelope addressed to each interested party as set forth above. I placed each such envelope, with postage thereon fully prepaid, for collection and mailing at Bryan Cave LLP, Santa Monica, California. I am readily familiar with Bryan Cave LLP's practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, the correspondence would be deposited in the United States Postal Service on that same day in the ordinary course of business.

☐ (BY FEDEX) I deposited in a box or other facility maintained by FedEx, an express carrier service, or delivered to a courier or driver authorized by said express carrier service to receive documents, a true copy of the foregoing document, in an envelope designated by said express service carrier, with delivery fees paid or provided for.

☐ (BY FAX) I caused a true copy of the foregoing document to be served by facsimile transmission at the time shown on each attached transmission report from sending facsimile machine telephone number (310) 576-2200 to each interested party at the facsimile number shown above. Each transmission was reported as complete and without error. A transmission report was properly issued by the sending facsimile machine for each interested party served. A true copy of each such transmission report is attached hereto.

Executed on October 12, 2006, at Santa Monica, California.

☒ (FEDERAL ONLY) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America and the state of California that the foregoing is true and correct.


Frank Kavelin